

EXHIBIT A

KNAPP, PETERSEN & CLARKE
550 North Brand Boulevard, Suite 1500
Glendale, California 91203
Telephone: (818) 547-5000
Facsimile: (818) 54705329
André E. Jardini (*Appearing Pro Hac Vice*)

Counsel for Plaintiffs William D. Pilgrim, et
al.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al.

Case No. 09-50026 (MG)

Debtors.

**DECLARATION OF CHAD REESE IN SUPPORT OF REPLY TO MOTION
OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363
TO ENFORCE THE BANKRUPTCY COURT'S JULY 5, 2009 SALE
ORDER AND INJUNCTION**

I, Chad Reese, declare as follows:

1. If called as witness I could and would testify as follows.
2. I am a resident of Montgomery, Alabama.
3. I purchased a Z06 Corvette (2006) in October 2014.
4. Shortly after I purchased my Z06, a valve dropped on a piston causing the engine to blow-up while I was driving. The mileage on the odometer at the time of this catastrophic engine failure was approximately 50,000 miles.
5. The piston was destroyed causing pieces of the piston to go through the engine and come out the passenger side of the block. Pieces of piston were in my intake.
6. A true and correct copy of pictures I took on or around June 17, 2015 of the damage to my engine are attached as Exhibit 10.
7. The cost to repair the engine has been \$10,600 so far and I estimate that the total will come to approximately \$15,000.

Executed on February 3, 2016, at Montgomery, Alabama.

I declare under penalty of perjury that the foregoing is true and correct.



Chad Reese









